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E-File: March 5, 2014

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12 **UNITED STATES BANKRUPTCY COURT**

13 **DISTRICT OF NEVADA**

15 In re:

16 MARTIFER AURORA SOLAR, LLC, a
 17 Nevada limited liability company,

- 18 Affects Martifer Aurora Solar, LLC
 Affects Martifer Solar USA, Inc.
 Affects All Debtors

19 Case No.: BK-S-14-10355-abl
 and BK-S-14-10357-abl

20 Jointly Administered Under
 Case No.: BK-S-14-10355-abl

21 Chapter 11

22 **STIPULATION BETWEEN THE
 DEBTORS AND THE OFFICIAL
 COMMITTEE OF UNSECURED
 CREDITORS FURTHER
 EXTENDING THE DEADLINE TO
 OBJECT TO DIP FINANCING
 MOTION**

23 **[Relates to Docket Nos. 85, 101, 231]**

24 Hearing Date: March 10, 2014
 Time: 9:30 a.m.
 Place: 300 Las Vegas Blvd. So.
 Courtroom
 25 Las Vegas, NV 89101

26
 27 Martifer Aurora Solar, LLC ("Martifer") and Martifer Solar USA, Inc. ("Martifer Solar"), the
 28 above-captioned debtors (collectively, the "Debtors"), and the Official Committee of Unsecured

1 Creditors (the “Committee” and together with the Debtors, the “Parties”), through their proposed
 2 counsel of record hereby stipulate and agree as follows in accordance with the following facts and
 3 recitals:

4 **RECITALS**

5 A. On January 21, 2014 (the “Petition Date”), the Debtors commenced these bankruptcy
 6 cases by each filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code.

7 B. On February 4, 2014, the Debtors filed the Amended Motion for Authority to Obtain
 8 Credit Under Section 364(b), Rule 4001(c) or (d) Motion for Order Pursuant to 11 U.S.C. § 364 and
 9 Fed. R. Bankr. P. 4001(c): (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting
 10 Related Relief; and (III) Scheduling Final Hearing [Docket No. 85] (the “Second DIP Financing
 11 Motion”).

12 C. On February 14, 2014 the United States Trustee appointed the Committee. [Docket
 13 No. 177]. On February 28, 2014, the Committee retained counsel.

14 D. On March 3, 2014, the Debtors and the Committee filed that certain Amended
 15 Stipulation Between Debtors and Official Committee of Unsecured Creditors Extending the Deadline
 16 to Object to DIP Financing Motion and Cash Collateral Motion [Docket No. 273] (the “First
 17 Stipulation”).

18 E. On March 4, 2014, the Court entered an order granting, the First Stipulation, extending,
 19 among other things, the Committee’s response deadline to the Second DIP Financing Motion and
 20 Interim DIP Order to and including March 5, 2014 at 5:00 p.m. without prejudice to the parties’ rights
 21 to further extend this date [Docket No. 280].

22 F. The parties require additional time to resolve issues raised by the Committee to the
 23 Interim DIP Order.

24 **SCHEDULING STIPULATION**

25 **NOW, THEREFORE, IT IS HEREBY STIPULATED** as follows:

26 1. The Committee’s response deadline to the Second DIP Financing Motion and Interim
 27 DIP Order is further extended to and including March 6, 2014 without prejudice to the parties’ rights
 28 to further extend this date.

1
2. The Debtors' reply is extended to and including March 8, 2014.
2
DATED this 5th day of March 2014.

3 **LARSON & ZIRZOW LLC**

4 */s/ Matthew C. Zirzow*
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18 */s/ Micaela Rustia Moore*
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25 Martifer Solar USA, Inc., Debtors